

DANIEL J. BRODERICK, #89424
Acting Federal Defender
LINDA C. HARTER, CA Bar #179741
Chief Assistant Federal Defender
Designated Counsel for Service
801 I Street, 3rd Floor
Sacramento, California 95814
Telephone: (916) 498-5700

Attorney for Defendant
MICHAEL ROBERT BOWLING

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:04-cr-0142 MCE
)	
Plaintiff,)	
)	
v.)	DEFENDANT'S REQUEST FOR EXPANDED
)	APPOINTMENT ORDER; ORDER
)	
MICHAEL ROBERT BOWLING,)	
)	
Defendant.)	
)	Judge: Hon. Morrison C. England
)	

Pursuant to 18 U.S.C. 3006A, the Office of the Federal Defender was appointed to represent the defendant, Michael Bowling, on March 17, 2004. Counsel undersigned has represented Mr. Bowling since that time.

The parties have agreed on a resolution of this case. It is Mr. Bowling's intention to accept a plea agreement in Butte County Superior Court in the near future. In exchange for his plea in that case and after sentencing in that case, the government will be moving this Court to dismiss the pending charges. Counsel undersigned has personally discussed the terms of the Butte County agreement with the assigned

1 assistant district attorney in Butte County. The charges in the Butte
2 County case are based upon the same facts underlying the federal
3 charges pending against this defendant.

4 18 U.S.C. 3006A(c) states that appointed counsel's representation
5 should continue through every stage of the proceeding "including
6 ancillary matters appropriate to the proceedings". Defense counsel is
7 seeking approval from this Court to represent Mr. Bowling in the Butte
8 County proceeding as it is clearly a matter that is related to the
9 federal case.

10 If defense counsel does not represent Mr. Bowling in the Butte
11 County matter he would have to request appointment of counsel in Butte
12 County. Butte County does not have a public defender office, so
13 contract counsel would be assigned and the case would be continued. New
14 counsel would need time to become familiar with the case. Counsel
15 undersigned has represented Mr. Bowling for over two years, has
16 reviewed all of the relevant evidence and has already discussed the
17 plea deal with the defendant. Defense counsel has discussed this
18 matter with Assistant District Attorney Linda Passmore and with
19 Assistant U.S. Attorney Camil Skipper and they have no objections to
20 this request.

21
22 Dated: April 6, 2006

23 Respectfully submitted,


24 DANIEL J. BRODERICK
25 Federal Defender

26 /s/ Linda C. Harter
27 LINDA C. HARTER
28 Chief Assistant Federal Defender
Attorney for Defendant
MICHAEL ROBERT BOWLING

O R D E R

Pursuant to 18 U.S.C. 3006A(c), this Court approves the expansion of the order appointing counsel to represent Michael Bowling to include representation in the ancillary matter in Butte County Superior Court as set forth in defendant's Request for Expanded Appointment. This approval is subject to the approval of the Superior Court Judge presiding over the case.

Dated: April 7, 2006



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE